

WEIL, GOTSHAL & MANGES LLP

Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

*Attorneys for Debtors and
Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors
** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF AGENDA FOR
NOVEMBER 9, 2021, 10:00 AND
11:00 A.M. OMNIBUS HEARINGS**

Date: November 9, 2021
Time: 10:00 and 11:00 a.m. (Pacific Time)
Place: Zoom Videoconference (10:00 a.m.)
AT&T Teleconference (11:00 a.m.)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

PROPOSED AGENDA FOR
NOVEMBER 9, 2021, 10:00 AND 11:00 A.M. (PACIFIC TIME)
OMNIBUS HEARINGS

**I: MATTERS SCHEDULED TO BE HEARD IN MAIN CASE AT 10:00 A.M.
(PACIFIC TIME): No. 19-30088 (DM)**

CONTESTED MATTERS GOING FORWARD

1. **Seventy-Sixth Omnibus Objection (No Liability / Passthrough Claims)**
[Dkt. 10537].

Responses Filed:

A. Willie and Ora Green [Dkts. 11278, 11355, 11429, and 11438].

Related Documents:

B. Corrected Reply in Support of Reorganized Debtors' Seventy-Sixth Omnibus Objection to Claims [Dkt. 11410].

C. Declaration of Thomas B. Rupp in Support of Reply in Support of Reorganized Debtors' Seventy-Sixth Omnibus Objection to Claims [Dkt. 11409].

D. Declaration of Kristin Jensen in Support of Reply in Support of Reorganized Debtors' Seventy-Sixth Omnibus Objection to Claims [Dkt. 11408].

E. Status Conference Statement Regarding Reorganized Debtors' Seventy-Sixth Omnibus Objection to Claims – Claim of Willie & Ora Green (Claim No. 80673) [Dkt. 11544].

Related Orders:

F. Order Disallowing and Expunging Proofs of Claim Pursuant to Reorganized Debtors' Seventy-Sixth Omnibus Objection to Claims (No Liability / Passthrough Claims) [Dkt. 10705].

G. Order After Hearing [Dkt. 11461].

Status: The Objection re Willie and Ora Green is going forward as a status conference.

This Omnibus Objection was granted as to most claims by Dkt. 10705.

2. **Seventy-Ninth Omnibus Objection (Books and Records Claims) [Dkt. 10673].**

Response Filed:

A. Addington, David P. [Dkt. 10872].¹

Related Documents:

B. Status Conference Statement Regarding Reorganized Debtors' Seventy-Ninth Omnibus Objection to Claims – Claim of David Addington (Claim No. 3093) [Dkt. 10851].

C. Reorganized Debtors' Report on Status of Objection to Claim 3093 (David P. Addington) [Dkt. 10896].

D. Status Conference Statement Regarding Reorganized Debtors' Seventy-Ninth Omnibus Objection to Claims – Claim of David Addington (Claim No. 3093) [Dkt. 11545].

Related Orders:

E. Order Disallowing and Expunging Proofs of Claim Pursuant to Reorganized Debtors' Seventy-Ninth Omnibus Objection to Claims (Books and Records Claims) [Dkt. 10858].

F. Order Setting Status Conference on Seventy-Ninth Omnibus Objection to Claims as to David Addington (Proof of Claim #3093) [Dkt. 11517].

Status: The Objection re David Addington is going forward as a status conference.

This Omnibus Objection was granted as to most claims by Dkt. 10858.

3. **Fulcrum Credit Partners LLC's Motion for Relief from Plan Injunction, to Compel Arbitration and/or for Abstention [Dkt. 11066].**

Response Filed:

A. Reorganized Debtors' Opposition to Motion for Relief from Plan

¹ On Monday, November 8, 2021, counsel for the Reorganized Debtors received an e-mailed document from Mr. Addington entitled *Creditor David P. Addington's Status Conference Statement*. Although the document has not yet appeared on the Court's docket, in his cover e-mail to counsel for the Reorganized Debtors, Mr. Addington stated that he had made arrangements to file this document with the Court.

Injunction, to Compel Arbitration and/or for Abstention [**Dkt. 11263**].

Related Documents:

- B. Declaration of Laura L. Goodman in Support of Reorganized Debtors' Opposition to Motion for Relief from Plan Injunction, to Compel Arbitration and/or for Abstention [**Dkt. 11264**].
- C. Reorganized Debtors' Objections to Declaration of Scott Bates [**Dkt. 11265**].
- D. Reply to Opposition to Motion for Relief from Plan Injunction, to Compel Arbitration and/or for Abstention [**Dkt. 11305**].
- E. Status Report by Fulcrum Credit Partners, LLC and Tuscan Ridge Associates, LLC [**Dkt. 11543**].
- F. Reorganized Debtors' Status Conference Statement Regarding Motion for Relief from Plan Injunction and Objection to Claim of Fulcrum Credit Partners, LLC [**Dkt. 11546**].

Related Order:

- G. 11/5/2021 Docket Text Order.

Status: This matter is going forward as a status conference.

4. **Reorganized Debtors' Objection to Fulcrum Credit Partners' Claim No. 58562** [**Dkt. 11288**].

Responses Filed:

- A. Response to Reorganized Debtors' Objection to Proof of Claim No. 58562 Filed by Fulcrum Credit Partners LLC as Transferee of Tuscan Ridge Associates, LLC [**Dkt. 11479**].

Related Documents:

- B. Declaration of Elouise Jadhav in Support of Reorganized Debtors' Objection to Proof of Claim No. 58562 Filed by Fulcrum Credit Partners LLC as Transferee of Tuscan Ridge Associates, LLC [**Dkt. 11289**].
- C. Declaration of Laura L. Goodman in Support of Reorganized Debtors' Objection to Proof of Claim No. 58562 Filed by Fulcrum Credit Partners LLC as Transferee of Tuscan Ridge Associates, LLC [**Dkt. 11291**].
- D. Request for Judicial Notice in Support of Fulcrum Credit Partners, LLC's

Response to Reorganized Debtors' Objection to Proof of Claim No. 58562 [Dkt. 11480].

E. Evidentiary Objections to Declaration of Elouise Jadhav in Support of Reorganized Debtors' Objection to Proof of Claim No. 58562 [Dkt. 11481].

F. Reorganized Debtors' Reply in Support of Objection to Proof of Claim No. 58562 Filed by Fulcrum Credit Partners LLC as Transferee of Tuscan Ridge Associates, LLC and Request for Scheduling Order [Dkt. 11521].

G. Reorganized Debtors' Objections to Declarations of Scott Bates, Courtney McAlister, John Moreno, and Mark West in Support of Response to Reorganized Debtors' Objection to Proof of Claim No. 58562 [Dkt. 11522].

H. Status Report by Fulcrum Credit Partners, LLC and Tuscan Ridge Associates, LLC [Dkt. 11543].

I. Reorganized Debtors' Status Conference Statement Regarding Motion for Relief from Plan Injunction and Objection to Claim of Fulcrum Credit Partners, LLC [Dkt. 11546].

Related Order:

J. 11/5/2021 Docket Text Order.

Status: This matter is going forward as a status conference.

RESOLVED AND CONTINUED MATTERS

5. **Motion to Extend Claims Objection Deadline:** *Motion for Entry of an Order Further Extending Deadline for the Reorganized Debtors to Object to Claims and for Related Relief* [Dkt. 11450].

Status: This Motion has been granted by Order [Dkt. 11533] and the deadline for the Reorganized Debtors to object to claims has been extended through and including June 21, 2022.

Securities Omnibus Claims Objection:

6. **Eighth (No Basis for Claim – Failure to Provide Any Trading Information)** [Dkt. 10922]. This Securities Omnibus Objection was granted as to all Claims (except those discussed below) by Dkt. 11103. This matter has been continued to November 23, 2021, as to Michael Dewan and Dennis Madden [Dkt. 11399]. It has been continued indefinitely as to Erik

1 and Rose von Buchau [Dkt. 11436]. This Securities Omnibus Objection has been withdrawn as
2 to the seventeen Claims listed in Dkt. 11398.

3 7. **Thirteenth (Claims Barred by the Statute of Repose)** [Dkt. 11085]. This
4 Securities Omnibus Objection was granted as to all Claims (except those discussed below) by
5 Dkt. 11315. This matter has been withdrawn without prejudice as to the Claims listed in
6 Dkts. 11401 and 11515.

7 8. **Fourteenth (Claims Barred by the Statute of Repose)** [Dkt. 11339]. This
8 Securities Omnibus Objection was granted as to all Claims (except those discussed below) by
9 Dkt. 11530. Except as to the Claim listed in Dkt. 11518, which has been continued to
10 November 23, 2021, this matter has been withdrawn without prejudice as to the Claims listed in
11 Dkt. 11516.

12 9. **Fifteenth (Securities Acquired Outside Subject Period)** [Dkt. 11343]. This
13 Securities Omnibus Objection was granted as to all Claims (except those discussed below) by
14 Dkt. 11531. This matter has been continued to December 7, 2021, as to the Claim listed in Dkt.
15 11520.

16 **Omnibus and Single Claim Objections:**

17 10. **Fortieth (No Liability / Passthrough Claims)** [Dkt. 9455]. This Omnibus
18 Objection was granted as to most Claims by Dkts. 9872 and 10468. The Scheduling Conference
19 as to Todd Greenberg has been continued to December 21, 2021 [Dkt. 11536].

20 11. **Forty-Fifth (Reduced and Allowed Claims)** [Dkt. 9466]. This Omnibus
21 Objection was granted as to most Claims by Dkt. 9869. A settlement has been reached and the
22 Objection is taken off calendar pending finalization of the settlement as to The Travelers
23 Indemnity Company [Dkt. 11524].

24 12. **Seventy-Ninth (Books and Records Claims)** [Dkt. 10673]. This Omnibus
25 Objection was granted as to most claims by Dkt. 10858. It has been continued to November 23,
26 2021, as to Marsh Landing, LLC [Dkt. 11525].

27 13. **One Hundred Eighth (PURPA Claims)** [Dkt. 11230]. This Omnibus Objection
28 has been continued to February 2, 2022, as to all Claims by Dkt. 11527.

1 **One Hundred Ninth (Books and Records Claims / Satisfied Claims)** [Dkt.
2 11346]. This Omnibus Objection was granted as to most Claims by Dkt. 11532. It has been
3 continued to December 7, 2021, as to the State of Connecticut Unclaimed Property Division
4 [Dkt. 11526].

5 15. **Jannings, Spiro (Claim No. 58462)** [Dkt. 11388]. This Claim Objection has been
6 continued to January 18, 2022 [Dkt. 11488].

**II: MATTER SCHEDULED TO BE HEARD IN MAIN CASE AT 11:00 A.M.
(PACIFIC TIME): No. 19-30088 (DM)**

CONTESTED MATTER GOING FORWARD

16. **One Hundred Seventh Omnibus Claims Objection (McColm Claims)**
[Dkt. 11227].

Responses Filed:

A. McColm, Patricia A. [Dkts. 11330 and 11448].²

Related Documents:

B. Reply in Support of Reorganized Debtors' One Hundred Seventh Omnibus Objection to Claims (McColm Claims) [Dkt. 11510].

C. Declaration of Mark A. Habib in Support of Reply in Support of Reorganized Debtors' One Hundred Seventh Omnibus Objection to Claims (McColm Claims) [Dkt. 11511].

Related Orders:

D. Order Regarding Filing by Patricia A. McColm [Dkt. 11356].

E. Order Regarding November 9, 2021 Hearing on One Hundred Seventh Omnibus Objection to Patricia A. McColm Claims [Dkt. 11542].

Status: The Objection re Patricia A. McColm is going forward on a contested basis.

² On Saturday, November 6, 2021, counsel for the Reorganized Debtors received a faxed document from Ms. McColm entitled *Objection to Reply re Response / Opposition to Reorganized Debtors' One Hundred Seventh Omnibus Objection to Claims (McColm Claims)*. The Reorganized Debtors expect that Ms. McColm has made arrangements to file this document with the Court, but it has not yet appeared on the Court's docket.

1 **PLEASE TAKE NOTICE** that copies of any pleadings filed with the Court and
2 referenced herein can be viewed and/or obtained: (i) by accessing the Court's website at
3 <http://www.canb.uscourts.gov>, (II) by contacting the Office of the Clerk of the Court at 450
4 Golden Gate Avenue, San Francisco, CA 94102, or (III) from the Debtors' notice and claims
5 agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-
4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-
mail at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents
on the Bankruptcy Court's website.

6 Dated: November 8, 2021

WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP

By: /s/ Thomas B. Rupp
Thomas B. Rupp

Attorneys for Debtors and Reorganized Debtors